

Subject: Re: John Does 1-7 v. The Taliban, blocked assets held by Bank of America, N.A.
Date: Wednesday, August 4, 2021 at 2:14:48 PM Eastern Daylight Time
From: John Thornton
To: Cynthia.cespedes@aycofarms.com, ap@aycofarms.com
CC: Daniela Jaramillo, Orlando Do campo, Teresita Isern, swiniker@winikerlaw.com
Attachments: DE 6 2021.05.03 Order for Final Execution[2].pdf, DE 7 2021.05.03 Writ of Execution (Haqqani).pdf, DE 8 2021.5.03 Writ of Execution (Taliban)[1].pdf, DE 9 2021.05.03 Writ of Execution (Al Qaeda_.pdf, 2021.07.15 Letter to BofA re- Lorenzana Lima[2].pdf

To Whom It May Concern:

I am writing to provide you notice that we have provided Bank of America with Writs of Execution (see attached) that we intend to enforce against blocked account number [REDACTED] 4030 corresponding to the Specially Designated National Waldemar Lorenzana Lima. We believe and intend to show that Lorenzana Lima is an agency/instrumentality of one or more of our clients' judgment debtors, and therefore that his blocked assets are subject to execution pursuant to federal law, particularly the Terrorism Risk Insurance Act.

Our understanding is that the source of the blocked funds is an accounts payable or wire transfer from Ayco Farms, Inc. to Mr. Lorenzana Lima. Thus, we are providing you notice of our intentions. We will be seeking an order that finds that Mr. Lorenzana Lima is an agency/instrumentality of one or more of our judgment debtors, orders his blocked assets released to the Plaintiffs in partial satisfaction of their judgment, and absolves Ayco of any liability for the underlying payment and assets that were blocked. We do not believe that any action is required of you, but we wanted to provide you notice of the proceedings in an abundance of caution.

I will be happy to answer any questions you might have.

Regards,

John Thornton
do Campo & Thornton, P.A.
Chase Bank Building
150 S.E. 2nd Avenue, Suite 602
Miami, FL 33131
Telephone: (305) 358-6600
Facsimile: (305) 358-6601
Mobile: (305) 494-1717
www.dandtlaw.com

Confidential & Privileged

Unless otherwise indicated or obvious from its nature, the information contained in this communication is attorney/client privileged and confidential information/work product. This communication is intended for the use of the individual or entity named above. If the reader of this communication is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error or are not sure whether it is privileged, please immediately notify us by return e-mail and destroy any copies--electronic, paper or otherwise--which you may have of this communication.